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February 21, 2023

VIA CM / ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: *In re Google Digital Advertising, 1:21-md-03010 (PKC) (all actions)*

Dear Judge Castel:

On behalf of all parties to the above-referenced MDL, we write to update the Court regarding the status of ESI negotiations in advance of the Case Management Conference scheduled for tomorrow. The parties have continued to meet and confer and have been able to resolve all but two issues:

1. Preservation of ad logs (Paragraph II.3(i) and footnote 2)
2. Linked Files and Collaborative Work Environments (Appendix J) and relatedly, the Metadata field “DOC LINK” in (Appendix D)

For the Court’s convenience, the parties jointly submit the attached draft ESI order which reflects all provisions the parties agree upon, as well as those the parties do not agree upon. As to the disagreements, this joint submission identifies the competing language being proposed by each party.

The parties thank the Court in advance for its consideration of these issues.

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Respectfully submitted,

/s/ Justina K. Sessions

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cc: All Counsel of Record (via CM / ECF)